

# **Exhibit B**

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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IN RE: TERRORIST ATTACKS  
ON SEPTEMBER 11, 2001,

03 MDL 1570 (GBD) (FM)

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New York, N.Y.  
May 13, 2015  
10:15 a.m.

Before:

HON. FRANK MAAS,

Magistrate Judge

APPEARANCES

For Plaintiffs:

KREINDLER & KREINDLER  
BY: JAMES P. KREINDLER  
ANDREW J. MALONEY

ANDERSON KILL  
BY: JERRY S. GOLDMAN  
BRUCE STRONG

MOTLEY RICE  
BY: ROBERT T. HAEFELE

COZEN O'CONNOR  
BY: SEAN P. CARTER

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1 THE COURT: Okay.

2 Anything else on the plaintiffs' side?

3 MR. CARTER: The last issue, your Honor, that we had  
4 raised was we're still a bit troubled by the timing of the  
5 production by Al Haramain USA of the collection of documents  
6 relating to its efforts to persuade the United Nations and the  
7 U.S. to lift the sanctions that have been imposed upon Al  
8 Haramain USA for the stated purpose of allowing the remaining  
9 director to dissolve the entity and disburse its remaining  
10 assets.

11 I think the timing of the production troubles us based  
12 on the track record with the defendant, along with the fact  
13 that the Court is presently in the process of considering a fee  
14 application that would result in the imposition of monetary  
15 sanctions.

16 Obviously the disbursement of the remaining assets  
17 would remove from our reach assets that we might otherwise  
18 pursue in satisfaction of either a fee award or with respect to  
19 the default judgment that's previously been issued as to the  
20 parent organization in Saudi Arabia.

21 THE COURT: Presumably the default judgment would  
22 dwarf anything that you might gain by way of legal fees.

23 MR. KABAT: Your Honor, may I briefly speak to that?

24 THE COURT: Please.

25 MR. KABAT: We represent all the defendants who

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1 plaintiff alleged have not produced anything.

2 One group of them, the current and former officers of  
3 the Muslim World League and the International Islamic Relief  
4 Organization do not have personal control and custody of the  
5 MWL or the IIRO documents. Instead, what has happened, the  
6 Muslim World League and the IIRO have produced some 345,000  
7 pages of documents which essentially are the documents that  
8 plaintiff requested from the individual officers of those  
9 entities. So it would be pointless for our firm to have to go  
10 through the 345,000 documents that the other firm has produced  
11 and say, Okay, this one is responsive for Dr. Al-Turki, this  
12 one is responsive for Dr. Naseef.

13 THE COURT: All of that is interesting, but I'm not  
14 sure it responds to the point that Mr. Carter was making with  
15 respect to Al Haramain. He doesn't want to see money walk out  
16 the door, and I'm not sure --

17 MR. KABAT: I'm sorry, your Honor. I didn't hear  
18 Mr. Carter say -- I know he talked about the other group of  
19 defendants they were complaining about.

20 THE COURT: Let me revert back to Mr. Carter.

21 Tell us again what it is you're seeking and why.

22 MR. CARTER: Your Honor, I take it at this point we  
23 are simply requesting an explanation as to why this particular  
24 groups of Al Haramain USA documents that relates specifically  
25 to efforts to obtain the removal of sanctions against it were

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1 calendar, but recently was added.

2 MR. KABAT: Judge Daniels set it for 11 a.m.

3 THE COURT: Why don't I just say if need be; although  
4 it doesn't sound like on the schedule we just set up that much  
5 of anything will happen between now and then; that if there's  
6 something we need to discuss, we can do it after Judge Daniels'  
7 conference or in lieu of it if it gets put off again. Okay?

8 MR. KREINDLER: Good.

9 MR. GOLDMAN: Thank you, your Honor.

10 THE COURT: Anything else?

11 Okay. Thank you, all.

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